

30 DEC 1990

For Six Month Period Ending

(Insert date)

Name of Registrant

Registration No. 508

Cleary, Gottlieb, Steen & Hamilton

Business Address of Registrant

1- One Liberty Plaza, New York, N.Y. 10006

2- 1752 N Street, N.W., Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

Not applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the Registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☐ Not applicable

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

The State of Kuwait  
Embassy of the State of Kuwait  
2940 Tilden Street, N.W.  
Washington, D.C. 20008

*Date acquired*  
August 7, 1990

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

CSR Limited, Sydney, Australia

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Rider 11

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?  
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Rider 12

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging in it believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
See Rider 14(a)			

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Total

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e)

<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes ☒      No ☐

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
See Rider 15 (a)			

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Total

**15. (b) DISBURSEMENTS—THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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**(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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**V—POLITICAL PROPAGANDA**

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

- ☐ Radio or TV broadcasts      ☐ Magazine or newspaper articles      ☐ Motion picture films      ☐ Letters or telegrams  
☐ Advertising campaigns      ☐ Press releases      ☐ Pamphlets or other publications      ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- ☐ Public Officials      ☐ Newspapers      ☐ Libraries  
☐ Legislators      ☐ Editors      ☐ Educational institutions  
☐ Government agencies      ☐ Civic groups or associations      ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in this political propaganda:

- ☐ English      ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>      Yes ☒      No ☐  
 Exhibit B<sup>7</sup>      Yes ☒      No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

Not applicable

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

## 27. SHORT FORM REGISTRATION STATEMENT

Not applicable

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ Not applicable

If no, list names of persons who have not filed the required statement.

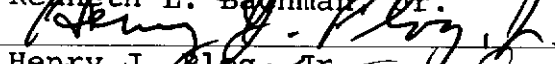
The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

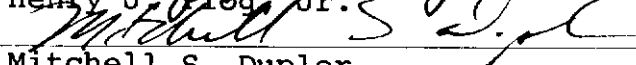
(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)

  
Douglas E. Kliever

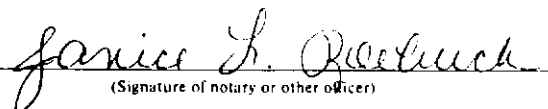
  
Kenneth L. Bachman Jr.

  
Henry J. Plog Jr.

  
Mitchell S. Dupler

Subscribed and sworn to before me at the District of Columbia

this 30th day of January, 19 91

  
(Signature of notary or other officer)

My Commission Expires February 14, 1994

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

**Rider 11: ACTIVITIES OR SERVICES FOR FOREIGN PRINCIPALS**

CSR Limited Registrant acts as counsel to CSR Limited, marketing agent for the Queensland Sugar Board. In this capacity, during the period registrant advised the Company with respect to regulations concerning the U.S. sugar market and with respect to administrative proposals relating to the U.S. sugar market.

Government of Kuwait Registrant provided legal advice and representation to the Government of Kuwait with respect to matters arising from the August 2, 1990 invasion of Kuwait by Iraq and the response of the United States Government thereto, including the issuance of Executive Orders 12723 and 12725, freezing the assets of Kuwait and Iraq, respectively.

Registrant represented the Government of Kuwait in established agency proceedings before the Office of Foreign Asset Control, United States Department of Treasury, regarding the issuance of licenses pursuant to Executive Orders 12723 and 12725.

Registrant also provided legal representation to the Government of Kuwait in connection with the negotiation, preparation, execution and interpretation of commercial and other contracts for the delivery of goods and services.

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DEPT. OF JUSTICE  
CRIMINAL DIVISION  
91 JAN 30 P1:44  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

**Rider 12: POLITICAL ACTIVITY**

Government of Kuwait Registrant has arranged and attended meetings or held telephone conferences with Executive branch personnel as set forth below. The purposes of these meetings and telephone calls were to discuss the U.S. position regarding the Iraqi invasion and occupation of Kuwait, including: the U.S. position regarding U.N. sanctions imposed against Iraq; the U.S. position on restrictions imposed on Kuwaiti assets; and the implications of the U.S. position on the licensing proceedings at the Office of Foreign Asset Control.

**OFFICIAL**

**DATE OF CALL  
OR MEETING**

**U.S. DEPARTMENT OF STATE**

Michael Matheson, Acting Legal  
Advisor

August 5, 6, 9, 17;  
September 5;  
November 16, 1990

Ronald Bettauer, Assistant  
Legal Advisor

August 4, 1990

Phillip Bobbitt, Counselor on  
International Law

August 22, 28;  
September 5, 17;  
November 16, 1990

Michael Young, Deputy Legal  
Advisor

August 6, 1990

Edward Gnehm, Ambassador  
Designate to Kuwait

September 25, 1990

Edwin D. Williamson, Legal  
Advisor

November 16, 1990

**U.S. Department of Treasury**

Richard Newcomb, Director of  
the Office of Foreign Asset  
Control

August 30;  
September 25, 1990

**U.S. Department of Defense**

Terrence O'Donnell, General  
Counsel

August 24, 1990

RIDER 14(a): RECEIPTS - MONIES

CSR LIMITED

07/26/90	Fees	\$1,000.00
	Disbursements	21.39
10/25/90	Fees	3,000.00
	Disbursements	65.48
	TOTAL:	\$4,086.87

GOVERNMENT OF KUWAIT

09/28/90	Fees	\$500,000.00
10/15/90	Fees	481,102.68
	Disbursements	44,665.36
12/07/90	Fees	505,000.00
	Disbursements	141,690.70
	TOTAL:	\$1,672,458.74

RIDER 15(a): DISBURSEMENTS - MONIES

CSR Limited

Miscellaneous In-House Expenses Washington, D.C.	Tolls, Allocation of indirect expenses	\$101.59
	Duplicating	24.80
	Word processing	7.98
	Messenger Service	6.00
	Postage	24.92
	Local Fares	10.20
	TOTAL:	\$175.49

Government of Kuwait

American Law Institute Philadelphia, PA	Publication	\$66.00
American Express Chicago, IL	Meals, Transportation	28,393.71
Archer Services New York, NY	Courier Service	27.00
Barwood Cab Kensington, MD	Local Fares	2,299.92
Bell's Washington, DC	Soft drinks	384.84
BNA Books Edison, NJ	Publication	114.77
CF Folks Washington, DC	Staff Late Work Meals	397.25
City Copying Stationery Washington, DC	Duplicating	109.22
Columbia Law School Lib.	Documents	22.55

New York, NY

The Copy Exchange Washington, DC	Duplicating	6,237.37
D.C. Treasurer Washington, DC	Sales Tax	7.50
De Pinna Scorers London, England	Notaries Expenses	232.51
DHL Airways Newark, NJ	Shipping	290.00
Direct Delivery Systems Washington, DC	Courier Service	86.00
Disclosure Baltimore, MD	Documents	453.64
Dutch Mill Deli Washington, DC	Staff Late Work Meals	2,418.76
Elite Car & Limo Woodside, NY	Local Fares	2,023.25
Executive Charge Inc. Brooklyn, NY	Local Fares	21.00
Fed. Document Retrieval Washington, DC	Documents	368.00
Federal Express Memphis, TN	Shipping	130.72
Flik International Mamaroneck, NY	Staff Late Work Meals	44.25
Int'l Bar Association London, England	Seminar	450.00
Lawson's Gourmet Washington, DC	Staff Late Work Meals	121.76
Little Brown & Co. Boston, MA	Publication	157.50
Metro World Travel	Travel-Transportation	176.00

Washington, DC

Network Courier Los Angeles, CA	Shipping	115.00
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North County Limo Armonk, NY	Local Fares	1,298.35
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Novotel Roissy Paris, France	Lodging	532.84
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Ocasa Int'l Courier New York, NY	Shipping	213.00
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Owner Drivers Radio Taxi London, England	Local Fares	520.41
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The Oxford Institute Oxford, England	Reference Material	420.66
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Red Top Cab Arlington, VA	Local Fares	18,017.81
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Roebuck Air Services London, England	Conference Transportation	140.49
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Sonic Air Phoenix, AZ	Shipping	268.00
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TNT Skypack Int'l Middlesex, England	Shipping	39.48
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TransWorld Airlines Newark, NJ	Travel-Transportation	8,063.66
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Ughi & Nunziante Rome, Italy	Reference Material	85.14
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Vital Two Way Radio Long Island, NY	Local Fares	666.00
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VU/Text Info. Services Philadelphia, PA	Database	12.87
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Washington Park Gourmet Washington, DC	Staff Late Work Meals	128.62
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World Courier	Shipping	131.20
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Jamaica, NY

Miscellaneous In-House  
Expenses  
Washington, D.C.

Tolls, Allocation of indirect expenses	\$37,863.84
Overtime Stenography	32,453.89
Duplicating	17,091.40
Velobinding	15.00
Word processing	7,632.33
Messenger Service	12,618.10
Postage	9.94
Local Fares	3,803.82
Conference Exp. Meals	699.36
Staff Late Work Meals	2,648.78
Travel-Transportation	2,400.65
Travel-Lodging	708.47
Travel-Meals	179.22
Computer Research	7,273.38
Publications	90.40
Stationery & Supplies	15.30
TOTAL:	\$124,562.21

Miscellaneous In-House  
Expenses  
New York, N.Y.

Tolls, Allocation of indirect expenses	\$8,394.15
Overtime Stenography	1,044.00
Duplicating	5,115.88
Travel-Transportation	941.67



Velobinding	25.00
Word processing	3,712.50
Messenger Service	145.00
Postage	.70
Shipping	1,385.00
Computer Research	1,812.57
Reference Material	48.92
<b>TOTAL:</b>	<b>\$22,625.39</b>

Miscellaneous In-House Expenses Paris, France	Tolls, Allocation of indirect expenses	\$91.08
	Duplicating	12.12
	Word Processing	8.23
	<b>TOTAL:</b>	<b>\$111.43</b>

Miscellaneous In-House Expenses Brussels, Belgium	Duplicating	\$2.10
	Postage	0.41
	<b>TOTAL:</b>	<b>\$2.51</b>

Miscellaneous In-House Expenses London, England	Tolls, Allocation of indirect expenses	\$7,140.81
	Overtime Stenography	3,077.28
	Duplicating	6,214.78
	Word processing	273.95
	Messenger Service	777.42

Local Fares	41.72
Shipping	89.38
Staff Late Work Meals	274.66
Computer Research	58.58
Reference Material	284.60
<b>TOTAL:</b>	<b>\$18,233.18</b>

Miscellaneous In-House Expenses Hong Kong	Tolls, Allocation of indirect expenses	\$168.73
	Duplicating	26.46
	Word processing	42.81
	<b>TOTAL:</b>	<b>\$238.00</b>

Miscellaneous In-House Expenses Tokyo, Japan	Tolls, Allocation of indirect expenses	\$164.53
	Duplicating	70.75
	Word processing	53.20
	<b>TOTAL:</b>	<b>\$288.48</b>

<b>GRAND TOTAL:</b>	<b>\$242,689.92</b>
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UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530

**NOTICE**

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form Crim-154, formerly Form OBD-64 - Supplemental Statement):

Yes \_\_\_\_\_ or No X \_\_\_\_\_

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes \_\_\_\_\_ or No X \_\_\_\_\_

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

  
Signature

January 30, 1991  
Date

Kenneth L. Bachman, Jr.  
Please type or print name of signatory on the line above

Partner  
Title

RECEIVED  
DEPT. OF JUSTICE  
CRIMINAL DIVISION  
91 JAN 30 P1:43  
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SECTION  
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